

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-7010



MAY 10 1994

Langdon Marsh
Acting Commissioner

Mr. Robert Hogan
Chairman, Joint Sewage Board
36 Chrisfield Ave.
Johnson City, New York 13790

Dear Mr. Hogan:

In March 1991, the United States Environmental Protection Agency (USEPA) issued a Record of Decision (ROD) for the Conklin Landfills Site. The remedial alternative specified in the ROD included the installation of a low permeability landfill cover with leachate collection. The leachate was to be either treated on-site or discharged to the sanitary sewer system for treatment at the Binghamton-Johnson City Sewage Treatment Facility.

The evaluations performed by the consulting firm that prepared the feasibility study, on which the ROD was based, concluded that the on-site treatment system would consist of an air stripper to remove low levels of volatile organic compounds (VOC). Based on samples of leachate collected, a greater concern for on-site treatment are the high levels of iron, suspended solids and Biological Oxygen Demand (BOD) in the untreated leachate. These parameters would not only be untreatable by an air stripper but would also have a detrimental effect on the operation of the air stripper and its ability to effectively remove the VOCs.

The ROD anticipated that Carlin Creek would be the discharge point for the on-site treatment option. Carlin Creek is an intermittent stream which cannot readily assimilate or dilute any discharge and, therefore, is very susceptible to environmental degradation. For this reason, effluent limitations are set very low. Discharge directly to the Susquehanna River is not practical, as the river is approximately 2000 feet from the site. The treated effluent would have to be piped under two major roads, a railroad track, and across a designated wetland and privately owned property to reach the river.

The treatment process necessary to approach effluent limitations for discharge to Carlin Creek would consist of biological treatment (i.e., extended aeration), chemical addition/precipitation, both primary filtration and secondary clarification, and possibly chlorination/dechlorination prior to discharge. The on-site treatment option would force the Town of Conklin to essentially construct a scaled down version of the Binghamton-Johnson City Sewage Treatment Plant approximately 30 feet away from the Binghamton-Johnson City sewerline.

An added significant concern is the level of complexity for the operation and maintenance of an on-site system. Though an on-site treatment system would be designed to operate automatically, chemical feed systems would require replenishment and sludge generated would require off-site disposal. These activities would require a level of effort and complexity for which the Town currently lacks the man-power and expertise.

Treatability studies performed for the Feasibility Study indicate that leachate from the site is readily treatable at the Binghamton-Johnson City Sewage Treatment Facility and would not adversely effect the treatment plant processes. The Binghamton-Johnson City Sewage Treatment Facility is designed to remove BOD and solids, the very parameters which would be difficult to treat in an on-site treatment plant, and the Town of Conklin has committed to meet any pre-treatment requirements.

Should the Sewer Board agree to accept the discharge from the site, the Town of Conklin could be considered a significant industrial user (SIU). The discharge rate is anticipated to be 4 or 5 gpm for the first year and approximately .5 gpm thereafter.

As stated in the enclosed January 4, 1991 correspondence from Mr. Brian Davidson, of my staff, to Mr. William Horrigan, the New York State Department of Health, the United States Environmental Protection Agency and this Department concurred that discharge to the on-site sanitary sewerline and treatment at the Binghamton-Johnson City Joint Sewage Treatment Plant, assuming that the discharge meets pretreatment requirements, is the preferred alternative.

The Town of Conklin has been notified by this Department that they are currently in violation of a 1987 Consent Order with this Department and stipulations of the March 1991 Record of Decision. This violation has occurred because the Town has not been able to obtain permission from the Sewer Board to discharge leachate into the on-site sewerline for treatment at the Binghamton-Johnson City Joint Sewage Treatment Plant, nor has the Town provided any other environmentally acceptable method of leachate treatment. This situation is unacceptable, and requires an expeditious resolution by the Town of Conklin.

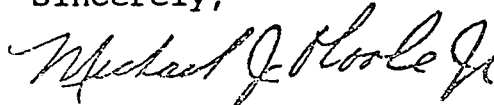
In order to help resolve this situation, I urge the Sewer Board to render a decision on this matter. In addition to any operational effects, I trust the Board will consider cost effectiveness, environmental and economic impacts to surrounding communities and the region.

Mr. Robert Hogan

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Thank you for your consideration and assistance in helping to resolve this matter. If this Department could provide your Board with any additional information on the Conklin Landfill site, please contact Mr. Brian H. Davidson, of my staff, at 518-457-1641.

Sincerely,

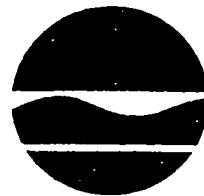
A handwritten signature in cursive script, reading "Michael J. O'Toole, Jr.".

Michael J. O'Toole, Jr.
Director
Division of Hazardous Waste
Remediation

enclosure

cc: Members of the Board
M. Gorgos, Coughlin and Gerhart
T. O'Hearn, Town of Conklin

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233 - 7010



Thomas C. Jorling
Commissioner

JAN 04 1991

Mr. William Horrigan
Plant Operator
Binghamton-Johnson City Joint
Sewage Treatment Plant
Old Vestal Road
Binghamton, New York 13903

Dear Mr. Horrigan:

RE: Conklin Landfills
Site No. 704013

The New York State Department of Health (NYSDOH), the United States Environmental Protection Agency (USEPA) and this Department have reviewed alternatives for treatment and discharge of leachate from the Conklin Landfills site located south of Powers Road, approximately one mile north of the Kirkwood Interchange of Interstate Route 81. The NYSDOH, USEPA and this Department concur that discharge to the on-site sanitary sewer line and treatment at the Binghamton-Johnson City Joint Sewage Treatment Plant is the preferred alternative, assuming that it meets pretreatment requirements. There are no State or Federal regulatory impediments to this alternative.

If I could provide you with any assistance on this matter, or if you have any questions or would like additional information, please do not hesitate to contact me at 518-457-1641.

Sincerely,

Brian H. Davidson
Project Manager
Bureau of Central Remedial Action
Division of Hazardous Waste
Remediation

cc: P. Fox
M. Gorgos
P. Marks

File on eDOCs X Yes _____ No _____
Site Name Conklin
Site No. 704013
County Broome
Town Conklin
Foilable no Yes _____ No _____
File Name 1994-05-10. Alternative Treatment
Scanned & eDOC _____